

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 04-10122-RWZ
)
)
 RENALD JEAN-BAPTISTE)

DEFENDANT'S MOTION FOR
OUT-OF-STATE TRAVEL EXPENSES

The defendant, Renald Jean-Baptiste, respectfully moves this Court, pursuant to 18 U.S.C. § 4285, for an order directing the U.S. Marshals Service to provide him with either funds so that he may purchase round-trip transport between New York City and Boston, Massachusetts, or with tickets for such a round-trip on a common carrier. The defendant further moves that the U.S. Marshals provide funds sufficient for him to stay in Boston for one day, including a night's hotel, prior to his appearance before this court on Thursday, August 19, 2004.

As grounds for this motion, undersigned counsel states that Mr. Jean-Baptiste is required to appear in court on August 19 for sentencing in the above-captioned case. Mr. Jean-Baptiste resides in New York City and is indigent. He needs to travel to Boston the day before this hearing, on Wednesday, August 18, so that he can confer with counsel before the hearing. Because Mr. Jean-Baptiste is indigent, he cannot afford round-trip transportation to Boston or lodging here for the night before the

hearing without hardship or having to incur indebtedness. For the above reasons, counsel for the defendant requests that this motion for travel funds be granted.

Respectfully submitted
By his attorney,

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